

# FETHERSTON EDMONDS, LLP

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## ATTORNEYS

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## STATEMENT

Christine Jordan  
778 Crystal Spgs Lane  
Keizer, OR 97303

Account Number: 81717  
Invoice Number: 0  
Statement Date: 12/12/2016  
Closing Date: 11/30/2016  
Attorney: JAT

Matter: Jordan, Christine

### Professional Services

			<u>Hours</u>	<u>Amount</u>
7/25/2014	JAT	Review of court docket and documents provided by Christine; including complaint and other pleadings.	1.00	250.00
	JAT	Meeting with attorney Jason Siebert re Burt claims.	0.70	175.00
	JAT	Tel conf with Christine re allegations in complaint and conversation with Siebert.	0.40	100.00
7/28/2014	JAT	Email correspondence with Christine re arguments against complaint; review of Judgt of Dissolution; email correspondence with Christine re same.	0.40	100.00
7/29/2014	JAT	Review of emails and other info from Christine; prepare and send letter to Seibert and Silver requesting withdrawal of claims.	2.00	500.00
	JAT	Meeting with Jason Seibert re withdrawing claims.	0.30	75.00
7/31/2014	JAT	Research and prepare memorandum in response to plaintiff's motion for asset freeze; declaration of Christine Jordan in support; file with the court.	3.40	850.00
8/4/2014	JAT	Discussion with Siebert re his offer to stay proceedings if we close WF account; email to Christine.	0.40	100.00
	JAT	Tel conf with Chris re Wells Fargo records and closing account; possible stay proposed as resolution; tel conf with Siebert re terms of stay.	0.50	125.00
8/5/2014	JAT	Email correspondence with Christine re closing Wells Fargo account and her conversations with Rafael.	0.20	50.00
	JAT	Tel conf with Will Fallon (Rafael's attorney) re strategy for dealing with Burt and Silver.	0.40	100.00
	JAT	Tel conf with David Silver re agreement to provide records.	0.40	100.00

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			<u>Hours</u>	<u>Amount</u>
8/5/2014	JAT	Tel conf with Chris re obtaining recent WF statement and closing account.	0.20	50.00
	JAT	Review of WF bank statement for June/July; email correspondence with Christine re same.	0.30	75.00
	JAT	Email correspondence with Silver re terms of abatement.	0.30	75.00
8/6/2014	JAT	Review of proposed subpoena from Silver; email correspondence with Christine and Silver re same.	0.30	75.00
	JAT	Office conf with Christine to discuss status of case and next steps.	0.30	75.00
	JAT	Prepare and file answer and affirmative defenses to complaint.	0.60	150.00
8/7/2014	JAT	Receipt and review of Plaintiff's Reply to Defendant's Opposition to Emergency Motion.	0.20	50.00
8/12/2014	JAT	Email correspondence with Christine re Burt's reply to motion for asset freeze and her availability.	0.20	50.00
8/19/2014	JAT	Review and respond to email from Christine re her being out of country and possibly writing letter to plaintiff.	0.30	75.00
9/2/2014	JAT	Receipt and review of opinion and order from court denying plaintiff's request for preliminary injunction.	0.20	50.00
9/3/2014	JAT	Email correspondence with Christine re order denying asset freeze.	0.20	50.00
9/5/2014	JAT	Email correspondence with Siebert and Silver re scheduling 26f conference.	0.20	50.00
9/12/2014	JAT	Prepare for and attend Rule 26 conference by phone.	0.50	125.00
9/16/2014	JAT	Receipt and review of proposed scheduling order from Siebert.	0.20	50.00
10/2/2014	JAT	Make revisions to Rule 26 scheduling order re confidentiality provisions for financial information; email to plaintiff's attys re same; Telephone conference with Court	0.50	125.00
11/3/2014	JAT	Prepare for and attend status conference with Judge; tel conf with plaintiff's counsel following conference.	1.00	250.00
11/7/2014	JAT	Email correspondence with Jason Siebert re subpoenas to various banks; review subpoenas.	0.30	75.00
12/15/2014	JAT	Receipt and review of notice of subpoena from plaintiff's attorney.	0.20	50.00
12/17/2014	JAT	Email correspondence with Siebert re ADR; email correspondence with Christine re same; tel conf with Christine.	0.40	100.00
12/18/2014	JAT	Review of email from Christine re ADR options and possible pro se representation; tel conf with Christine; email to plaintiff's attorney.	0.30	75.00

			<u>Hours</u>	<u>Amount</u>
12/18/2014	JAT	Email correspondence with Siebert re joint ADR report; email correspondence re proposed changes and various settlement offers.	0.50	125.00
12/22/2014	JAT	Receipt and review of plaintiff's first request for admissions and production.	0.20	50.00
	JAT	Letter to Christine enclosing plaintiff's first RFA and RFP.	0.30	75.00
1/6/2015	JAT	Email correspondence with Jordan re discovery; email from Siebert requesting deposition dates.	0.20	50.00
1/7/2015	JAT	Tel conf with Christine re discovery responses and deposition dates; email correspondence with Siebert re same.	0.30	75.00
1/9/2015	JAT	Office conf with Christine to review and discuss discovery responses.	0.50	125.00
1/13/2015	JAT	Tel conf with Jason re discovery requests and possible need to postpone depo.	0.20	50.00
1/14/2015	JAT	Receipt and review of prior email correspondence from Rafeal; review in preparation for production to plaintiff.	0.30	75.00
1/15/2015	JAT	Prepare response to Plaintiff's Requests for Admission and Requests for Production; letter to plaintiff's attorney.	0.50	125.00
1/20/2015	JAT	Email correspondence with Seibert and Jordan confirming depo.	0.20	50.00
1/22/2015	JAT	Prepare for and attend depo of Christine Jordan.	3.00	750.00
2/2/2015	JAT	Email correspondence with court re scheduling conference; review of notice from court re same.	0.20	50.00
	JAT	Review of email from Seibert re additional discovery requests; email to Chris; tel conf with Chris to discuss.	0.50	125.00
	JAT	Review FRCP 26 re scope of discovery.	0.30	75.00
2/3/2015	JAT	Review and respond to lengthy email from Seibert re production issues; review FRCP re scope of discovery.	0.80	200.00
2/4/2015	JAT	Tel conf with Jason Seibert to confer on discovery issues and additional documents they want.	0.50	125.00
	JAT	Email to Christine re document production strategy and follow up re conversation with Seibert.	0.30	75.00
2/5/2015	JAT	Additional email correspondence from Seibert and Silver re various threats etc; email correspondence with Christine; tel conf with Christine.	0.30	75.00
2/6/2015	JAT	Email correspondence with Seibert re discovery issues; email from Jason re amending his complaint to add claims for RICO, money laundering, etc; email correspondence with Christine.	0.40	100.00

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2/6/2015	JAT	Discuss case with Jim Edmonds; research re summary judgment options on various claims.	0.40	100.00
2/10/2015	JAT	Email correspondence with Seibert re Wells Fargo checks and other discover requests; respond to his request for stipulation on amended complaint.	0.30	75.00
	ASL	Start initial research on disclosure issues	0.50	20.00
2/11/2015	JAT	Email correspondence with Court and counsel re postponed scheduling conference.	0.10	25.00
2/12/2015	JAT	Receipt and review of WF check copies from Christine; scan and prepare for production to plaintiff.	0.30	75.00
	JAT	Email correspondence with Christine re checks; email correspondence with Seibert re checks and his additional requests.	0.30	75.00
	ASL	Continue research and draft memo	5.00	200.00
2/16/2015	JAT	Email correspondence with Seibert re settlement; email from Christine re correspondence with Brian at Wells Fargo; tel conf with Christine.	0.20	50.00
2/17/2015	ASL	Begin research on possession issue	1.00	40.00
2/18/2015	JAT	Scheduling conference with Judge Aiken.	0.30	75.00
	JAT	Email correspondence with Seibert re settlement conference with Judge Coffin.	0.20	50.00
	JAT	Receipt and review of scheduling order from court, re settlement conf; email to Christine.	0.20	50.00
2/19/2015	ASL	Finish research and write memo on possession issue	1.50	60.00
2/25/2015	JAT	Receipt and review of notice of subpoenas to US Bank, State Farm and 4 other parties.	0.20	50.00
2/27/2015	JAT	Receipt and review of letter from Seibert enclosing Motion to File First Amended complaint.	0.20	50.00
	JAT	Review First Amended Complaint and attached Motion (42 pgs).	0.40	100.00
3/3/2015	JAT	Receipt and review of redlined amended complaint from plaintiff's attorney; review new RICO claims and other claims; email to Christine.	0.50	125.00
	JAT	Tel conf with Seibert re conferring on motion to file amended complaint.	0.30	75.00
3/11/2015	JAT	Receipt and review of plaintiff's motion for leave to file amended complaint.	0.20	50.00
	JAT	Research and prepare confidential mediation statement for Judge Coffin, in preparation for settlement conf.	3.00	750.00

		<u>Hours</u>	<u>Amount</u>
3/18/2015	JAT Attend settlement conference with Judge Coffin in Eugene	4.20	1,050.00
3/19/2015	JAT Email correspondence with Christine re conversations with Rafeal; questions comments about settlement conference with Coffin.	0.30	75.00
3/20/2015	JAT Tel conf with Rafael re meeting; tel conf with Will Fallon re case status, status of east coast cases; strategy.	0.50	125.00
3/23/2015	JAT Office conf with Rafael and Will Fallon (by phone), re background with Burt and possible strategies to resolve case.	1.30	325.00
	JAT Review of complaint and 2010 settlement agreement in light of info from Raf; outline factual inconsistencies and errors; email to Christine.	0.50	125.00
3/24/2015	JAT Discussion with Jim re discovery issues, options for responding to amended complaint and strategy; research re federal case law and good faith requirement in pleadings.	0.60	150.00
	JAT Receipt and review of Plaintiff's second request for production of documents.	0.20	50.00
	JAT Review FRCP and caselaw re permissible purposes of motion to strike.	0.70	175.00
4/1/2015	JAT Prepare defendants first request for production to plaintiff; prepare first request for admissions.	0.70	175.00
4/7/2015	JAT Tel conf with Christine re plaintiff's second RFP.	0.60	150.00
4/16/2015	JAT Prepare response to plaintiff's second request for production; email to Silver.	0.50	125.00
4/17/2015	ASL Begin research on tax return issue	1.50	60.00
4/20/2015	JAT Tel conf with Jason Seibert re discovery issues and his threats to file various motions.	0.30	75.00
	JAT Receipt and review of plaintiff's First Amended Complaint and exhibits (200 pgs).	0.20	50.00
4/21/2015	ASL Continue research on tax return issue	1.50	60.00
	JAT Review Response to RRFP; email correspondence with Jason re his accusation that we did not respond.	0.30	75.00
	JAT Email correspondence with Seibert re confirmation of issues discussed; reciting our objections to discovery requests and his threats to file motion to compel.	0.50	125.00
	JAT Letter to Seibert and Silver enclosing copies of Wells Fargo checks.	0.30	75.00
4/23/2015	ASL Finalize research and draft memo for Jeff	1.00	40.00
4/27/2015	JAT Receipt and review of plaintiff's Motion to Compel Production and supporting declaration.	0.40	100.00
4/28/2015	JAT Review of amended complaint and detail issues for FRCP 11 violations; email to Seibert detailing issues and request to confer before filing motions.	1.80	450.00

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5/4/2015	JAT Email correspondence with Jason re further attempt to confer on motions.	0.20	50.00
5/8/2015	JAT Review and respond to email from Siebert re motion to strike.	0.30	75.00
	JAT Research and prepare Defendant's Response to Motion to Compel; prepare Jordan Declaration; Trautman Declaration; file with court.	5.30	1,325.00
5/11/2015	JAT Email correspondence with Christine re status and requesting docs from Wells Fargo.	0.20	50.00
	For professional services rendered	65.30	\$13,805.00
	Accounts receivable transactions		
7/31/2014	Invoice No. 23136	23136	\$2,050.00
8/7/2014	Payment from Trust - Thank You		(\$2,050.00)
8/31/2014	Invoice No. 23315	23315	\$1,150.00
9/9/2014	Payment from Trust- Thank You		(\$1,150.00)
9/30/2014	Invoice No. 23505	23505	\$325.00
10/9/2014	Payment from Trust - Thank You		(\$325.00)
10/31/2014	Invoice No. 23624	23624	\$125.00
11/6/2014	Payment from Trust- Thank You		(\$125.00)
11/30/2014	Invoice No. 23844	23844	\$325.00
12/4/2014	Payment from Trust- Thank You		(\$325.00)
12/31/2014	Invoice No. 24088	24088	\$475.00
1/14/2015	Payment from Trust- Thank You		(\$475.00)
1/31/2015	Invoice No. 24204	24204	\$1,300.00
2/6/2015	Payment From Trust- Thank You		(\$1,300.00)
2/28/2015	Invoice No. 24341	24341	\$1,920.00
3/4/2015	Payment from Trust- Thank You		(\$250.00)
3/31/2015	Invoice No. 24660	24660	\$3,075.00
4/10/2015	Payment from Trust - Thank You		(\$4,000.00)
4/30/2015	Invoice No. 24861	24861	\$1,560.00
5/26/2015	Payment - Thank You No. 892		(\$2,000.00)
5/31/2015	Invoice No. 25035	25035	\$1,500.00
	Total payments and adjustments		\$1,805.00
	Client funds transactions		
	New balance of Default		<u><u>\$0.00</u></u>

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